STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to facilitate the implementation of the Federal Communications Commission's Triennial Review determination in Michigan.	U-13796

_____/

MICHIGAN PUBLIC SERVICE COMMISSION STAFF'S FIRST DISCOVERY REQUEST TO ALL TELECOMMUNICATIONS CARRIERS LICENSED IN MICHIGAN

The Staff of the Michigan Public Service Commission, by its attorney, Steven D.

Hughey, Assistant Attorney General, submits, pursuant to R 460.17317 (Rule 317) of the

Commission Rules and Practice and Procedure, the following discovery request to all

telecommunications carriers licensed in Michigan. This request is being made to assist the

Michigan Public Service Commission in facilitating the implementation of the Federal

Communications Commission's Triennial Review determination in Michigan.

<u>INSTRUCTIONS</u>

A.   If you have not received this discovery request in an electronic format (by e-mail)

and wish to receive an electronic version, submit your e-mail address to

pagelsmr@michigan.gov.

B.   Please follow the instructions which accompany each discovery request (i.e.

spreadsheet).

C.   A copy of the protective order adopted by the parties to this case accompanies this

request.

INSTRUCTIONS for "switching_questions.xls"

Michigan Public Service Commission Staff Switching Questions (for both ILECs and CLECs). All licensed telecommunication carriers operating in SBC territory should answer these questions within 14 days of service.

FCC Rules, Section 51.319 (d) (2)

General Instructions

The trigger information requested is to be provided on an electronic
spreadsheet: "switching_questions".xls
This spreadsheet includes a few rows of
example entries. Respondents should remove the example information before
entering their own information. The number of spreadsheet rows which each
ILEC and CLEC will be required to provide data on depends upon the number
of switches for which each company
has provisioned facilities. Instructions are included with the
spreadsheet. Additional questions regarding collocation issues are included on two separate tabs
and should also be answered.

The company's response may be marked "Confidential" or "Highly Sensitive Confidential
Information" pursuant to the Protective Order entered in Case No. U-13796.

Responses should be served upon the Michigan Public Service Commission Staff and upon all
parties in Case No. U-13796.

The electronic spreadsheets are
set up in a manner that will allow the responses to be compiled, and
queried in an efficient manner. These responses should be provided in
light of the SBC's filings regarding geographic areas and
services to which they plan to challenge the FCC's impairment finding.

After completing the spreadsheets, please save them electronically with
your company name replacing the word "question" in the title of the
spreadsheet. For example, "switching_"
should precede your company name (e.g.,
switching_COMPANY NAME.xls)

All submissions should be marked with "**Case No. U-13796".**
All submissions should be served upon parties in Case No. U-13796 and may, in accordance with
the terms of the Protective Order, be served electronically (i.e., via email or CD-Rom).

Verification
Upon completion of the spreadsheet, a representative of the Company should execute the
verification page and include it with the response

Instructions for completing the spreadsheet
All responding companies should complete the two preliminary questions:

Preliminary Question 1(a) -- State whether the Company completing this matrix owns one or
more switches that perform baisc switching functions of connecting lines to lines, lines to trunks,
trunks to lines, and trunks to trunks. If the answer to this question is "no", the Company should so
indicate on the matrix, and the Company is not required to complete the matrix.

Preliminary Question 1(b) -- State whether the Company completing this matrix, if it owns one
more switches as described in 1(a), whether those switches are used exclusively for the provision
of mobile wireless telecommunications, or are exclusively used for the provision of long distance
telephone service. If the answer to this question is "Yes" for any switch, the Company should so
indicate on the matrix, and the Company is not required to complete the matrix with regard to those
switches used exclusively for the provision of mobile wireless telecommunications or used
exclusively for the provision of long distance telephone service.

Preliminary Question 1(c) -- State whether the Company completing this matrix, if it owns one or
more switches as described in 1(a), whether any of those switches are used either to serve local
telecommunications end users that are physically located in the SBC Michigan serving area or to
offer wholesale local switching service to other providers serving local telecommunications end
users physically located in the SBC Michigan serving territory. If the answer to this question is
"No," the Company should so indicate on the matrix, and the Company is not required to complete
this switching matrix. If the answer to this question is "yes," the Company should complete all
sections of the matrixes applicable.

Preliminary Question 2 -- Does the Company Identified in cell A3 obtain any DS-0/voice loops
(not DS-1) via Enhanced Extended Link (or EEL) at a central office location where the Company
does not have collocation. Please indicate "yes" or "no" in the appropriate space on the
spreadsheet.

Matrix questions

Fill in the electronic spreadsheet "switching_questions.xls"

with the following information for each Michigan serving

switching entity that you have self-provisioned. These switches

may provide service to either your company's Michigan retail customers

or might be used by another carrier to provide service to its

Michigan customers (I.e., wholesale switching service). Information should only be provided for switches owned and/or operated by the responding company.

Switching_questions Tab

Please provide the 11-digit COMMON LANGUAGE® Location Identifier

 CLLI™) of each switch used to provide qualifying service anywhere

 in the state of Michigan. (Column A)

Category type of switch. Check one of the following

(End Office, Tandem Office, Multi-Function, Remote Line, Packet,

Broadband, Cellular, Other). (Columns B - I) Mark the cell with an "X" and in the cell below identify the type of switch.

If you check Column I ("Other"), describe or identify switch type.

Number of DS0/Voice grade access (not DS-1) lines equipped. (Column J)

Number of DS0/Voice grade (do not included DS-1) access lines in use. (Column K)

Switch processor capacity in Centum Call Seconds (CCS). (Column L)

Number of DS0 lines served by this switch that provide voice-grade service to residential customers. (Column M)

Number of DS0 lines served by this switch that provide voice-grade service to business customers. (Column N)

Vertical coordinate of switching facility (e.g., 4634).

This is a four- or five-digit number related to the geographic

location of a switching entity found in table 7 of the Local

Exchange Routing Guider (LERG7). This should not be confused

with the Rate Center found in Table 8 of the LERG (LERG8). (Column O)

Horizontal coordinate of switching facility (e.g., 1630). See

note above. (Column P)

Switching entity street address (e.g., 660 Plaza Dr.). (Column Q)

Switching entity city (e.g., Detroit). (Column R)

Switching entity state (i.e., MI). (Column S)

Switching entity five digit zip code (e.g., 48226). (Column T)

Is this switching facility used to provide service to your own

retail customers? (Column U)

Identify, by eight-digit CLLI code, for each wire center district served (i.e., the territory served by SBC Michigan switch) by the switch identified in Column U, identify on the basis of available information the number of DS0 voice grade (do not include DS-1) lines that serve your own retail customer locations. (Column V)

Is this switching facility used by another carrier to provide

service to its retail customers (i.e., wholesale switching services)? (Column X)

Identify, by eight-digit CLLI code, for each wire center district served (i.e., the territory served by SBC Michigan switch) by the switch identified in Column X, identify on the basis of available information the number of DS0 voice grade (do not include DS-1) lines that are serving, via another carrier using the switch on a wholesale basis. (Column Y)

Column Z -- Identify, by eight-digit CLLI code, each wire center district served (i.e., the territory served by SBC Michigan switch) and in the cell below the CLLI code, identify on the basis of available information the number of DS0 voice grade (do not use DS-1) lines that serve customer locations using 3 or fewer voice-grade lines in the wire center district identified. (Use columns AA and beyond to provide information for each wire center district.)

Collocation Tabs

For each collocation arrangement the responding company has in the ILEC central office in Michigan (where the ILEC is contesting impairment), provide the following information reported by ILEC CLLI Code.

Fill out Collocation remaining column as directed.

Fill out the Collocation Table tab as directed in cell C2.

Preliminary Question 1(a) -- State whether the Company completing this matrix owns one or more switches that perform baisc switching functions of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks. If the answer to this question is "no", the Company should so indicate on the matrix, and the Company is not required to complete the matrix.   Yes/No

Preliminary Question 1(b) -- State whether the Company completing this matrix, if it owns one or more switches as described in 1(a), whether those switches are used exclusively for the provision of mobile wireless telecommunications, or are exclusively used for the provision of long distance telephone service. If the answer to this question is "Yes" for any switch, the Company should so indicate on the matrix, and the Company is not required to complete the matrix with regard to those switches used exclusively for the provision of mobile wireless telecommunications or used exclusively for the provision of long distance telephone service.   Yes/No

Preliminary Question 1(c) -- State whether the Company completing this matrix, if it owns one or more switches as described in 1(a), whether any of those switches are used either to serve local telecommunications end users that are physically located in the SBC Michigan serving area or to offer wholesale local switching service to other providers serving local telecommunications end users physically located in the SBC Michigan serving territory. If the answer to this question is "No," the Company should so indicate on the matrix, and the Company is not required to complete this switching matrix. If the answer to this question is "yes," the Company should complete all sections of the matrixes applicable.   Yes/No

Preliminary Question 2 -- Does the Company Identified in cell A5 obtain any DS-0/voice loops (not DS-1) via Enhanced Extended Link (or EEL) at a central office location where the Company does not have collocation. If the answer is yes, please indicate.   Yes/No

Company Name Goes Here	Enter "X" if applicable	Enter "X" if applicable	Enter "X" if applicable	Enter "X" if applicable	Enter "X" if applicable	Enter "X" if applicable	Enter "X" if applicable	Enter "X" if applicable											Enter "Y" if yes, blank if no		Enter "Y" if yes, blank if no	
Please provide the 11-digit COMMON LANGUAGE® Location Identifier CLLI™) of each switch currently used to provide qualifying service anywhere in the state of Michigan.	Category type of switch. (End Office). Identify type of Switch in cell below "X".	Category type of switch. (Tandem Office). Identify type of Switch in cell below "X".	Category type of switch. (Multi Function). Identify type of Switch in cell below "X".	Category type of switch. (Remote Line) Identify type of Switch in cell below "X".	Category type of switch. (Packet). Identify type of Switch in cell below "X".	Category type of switch. (Broad Band). Identify type of Switch in cell below "X".	Category type of switch. (Cellular). Identify Type of switch.	Category type of switch. (Other) If "Other," describe or identify type of other switch.	Number of DS-0/voice grade (do not include DS-1) access lines equipped.	Number of DS-0/voice grade (do not include DS-1) access lines in use.	Switch processor capacity in Centum Call Seconds (CCS).	Number of DS0 lines served by this switch that provide voice-grade service to residential customers.	Number of DS0 lines served by this switch that provide voice-grade service to business customers.	Vertical coordinate of switching facility	Horizontal coordinate of switching facility	Switching entity street address	Switching entity city	Switching entity state	Switching entity five digit zip code	Is this switching facility used to provide service to your own retail customers?	Identify, by eight-digit CLLI code, for each wire center district served (i.e., the territory served by SBC Michigan switch) by the switch identified in Column U, identify on the basis of available information the number of DS0 voice grade (do not include DS-1) lines that serve your own retail customer locations.	Is this switching facility used by another carrier to provide service to its retail customers (i.e., wholesale switching services)?	Identify, by eight-digit CLLI code, for each wire center district served (i.e., the territory served by SBC Michigan switch) by the switch identified in Column W, identify on the basis of available information the number of DS0 voice grade (do not include DS-1) lines that are serving, via another carrier using the switch on a wholesale basis.
A	**B**	**C**	**D**	**E**	**F**	**G**	**H**	**I**	**J**	**K**	**L**	**M**	**N**	**O**	**P**	**Q**	**R**	**S**	**T**	**U**	**V**	**W**	**X**
note: delete this row and example entry rows below before adding your own company information						note: delete this row and example entry rows below						note: delete this row and example entry rows below			note: delete this row and example entry							
DTRTMIDODS0	X		X						50000	34567		0	33112			660 PLAZA DR	Detroit	MI	48226	Y			

(Beginning in Column Z, use one column for each applicable wire center district.) ======>

	Z	AA	AB	AC	AD	AE	AF	AG
Identify, by eight-digit CLLI code, each wire center district served (i.e., the territory served by SBC Michigan switch) and in the cell below the CLLI code, identify on the basis of available information the number of DS0 voice grade (do not include DS-1) lines that serve customer locations using 3 or fewer voice-grade lines in the wire center district identified. (Use columns Z and beyond to provide information for each wire center district.)								
Y	**Z**	**AA**	**AB**	**AC**	**AD**	**AE**	**AF**	**AG**
note: delete this row and example entry rows below before adding your own company information								

For each collocation arrangement the responding company has in the ILEC central office in Michigan (where the ILEC is contesting impairment), provide the following information reported by ILEC CLLI Code.												
Company Name Goes Here		For each collocation arrangement identified in response to this request, provide the information in the Collocation Table tab.					*Enter "X" if applicable*	*Enter "X" if applicable*	*Enter "X" if applicable*			
Collocation arrangement central office CLLI code.	Collocation arrangement street address	Collocation arrangement city	Collocation arrangement state	Collocation arrangement five digit zip code	Collocation arrangement vertical coordinate	Collocation arrangement horizontal coordinate	Type of collocation arrangement (caged)	Type of collocation arrangement (cageless)	Type of collocation arrangement (virtual)	The type of collocation equipment (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.)	Collocation equipment capacity in the number of DS0 voice grade equivalent channels.	Working collocation equipment in DS0 voice grade equivalent channels.
A	**B**	**C**	**D**	**E**	**F**	**G**	**H**	**I**	**J**	**K**	**L**	**M**

Central Office (Use ILEC 8-digit wire center CLLI code)	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End Users Customers (This category includes loops used for fax and/or modem-only traffic.)	Number of DSL Only End-User Customers	Number of Line Shared/Line Split DSL End User Customers
CLLI						
ABC	1	e.g. 1,017	Residential	e.g. 1,000	e.g. 2	e.g. 10
	1	e.g. 540	Business	e.g. 500	e.g. 10	e.g. 10
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	4		Residential			
	4		Business			
	5		Residential			
	5		Business			
	6		Residential			
	6		Business			
	7		Residential			
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	12		Residential			
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	13		Residential			
	13		Business			
	14		Residential			
	14		Business			
	15		Residential			
	15		Business			
	16		Residential			
	16		Business			
	17		Residential			
	17		Business			
	18		Residential			
	18		Business			

	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

State of Michigan
Before the Michigan Public Service Commission
Case No. U-13796

VERIFICATION

State of ....)

)   ss.:

County of ....)

          ....verifies and

states: I am the .... of ....
              (Here insert the official title of the deponent)   (Here insert exact name of the reporting company)

....……........…

I am familiar with the preparation of the foregoing information and know generally the contents thereof.
Said information

consists of ....……………………………...
                       (Here insert exact identification of the information)

....

is true and correct to the best of my knowledge and belief.   As to matters not actually stated upon my knowledge,

the sources of my information and the grounds for my belief are as follows: ....

....

....

....

..............................……………….........................
                        Signature

INSTRUCTIONS for "loop_questions.xls"	
Michigan Staff High-Capacity Loop Questions (for both ILECs and CLECs)	
FCC Rules, Sections 51.319 (a) (4), (5) and (6)	
All licensed telecommunication carriers operating in SBC territory should answer these questions within 14 days of service.	
General Instructions	
The trigger information requested is to be provided on an electronic spreadsheet	
"loop_questions".xls. The spreadsheet includes a few rows of	
example entries. Respondents should remove the example information before	
entering their own information. The number of spreadsheet rows which each	
ILEC and CLEC will be required to provide data on depends upon the number	
of customer locations for which each company	
has provisioned facilities. Detailed instructions are attached to the	
spreadsheet.	
The company's response may be marked "Confidential" or "Highly Sensitive Confidential Information" pursuant to the Protective Order entered in Case No. U-13796.	
Responses should be served upon the Michigan Public Service Commission Staff and upon all parties in Case No. U-13796.	
After completing the spreadsheets, please save them electronically with	
your company name replacing the word "question" in the title of the	
spreadsheet. For example	
loop_ should precede your company name (e.g.,	
loop_COMPANY NAME.xls").	
All submissions should be marked with "**Case No. U-13796".**	
All submissions should be served upon parties in Case No. U-13796 and may, in accordance with the terms of the Protective Order, be served electronically (I.e., via email or CD-Rom).	
Verification	
Upon completion of the spreadsheet, a representative of the Company should execute the verification page and include it with the response	
Instructions for completing the spreadsheet	
Fill in the electronic spreadsheet "loop_trigger_questions.xls" with	
the following information for each Michigan customer location	
for which your company has deployed high-capacity loop facilities.	
These facilities might be used either by your own retail customers,	
or by an unaffiliated carrier's customer. Include facilities for both	
those customers served entirely by your own facilities and those for	
customers served by attaching your own optronics to activate dark fiber	

transmission facilities provided by another carrier.	
This matrix need not be completed by companies who do not <u>own</u> high-capacity loop facilities that are deployed in Michigan. For the purpose of this matrix, high capacity loop facilities you may rent or lease from SBC Michigan do not apply. If you do not <u>own</u> high-capacity loop facilities in Michigan, then so indicate, and you do not have to fill out the matrix."	
Street address of customer served by high-capacity loop (e.g., 10 South Canal (Column A)	
City of customer served by high-capacity loop (e.g., Chicago). (Column B)	
State of customer served by high-capacity loop (i.e., IL). (Column C)	
Five-digit zip code address of customer served by high-capacity loop (e.g., 60602). (Column D)	
Customer Location V Coordinate (if readily available, e.g., 4700). (Column E)	
Customer Location H Coordinate (if readily available, e.g.,1640). (Column F)	
High-capacity loop type (dark fiber, DS1, DS3). (Column G – I)	
Customer serving wire center eight-digit CLLI code (e.g., CHCGILWJDS0). (Column J)	
Serving wire center V Coordinate (e.g., 4639). (Column K)	
Serving wire center H Coordinate (e.g., 1629). (Column L)	
The number of circuits serving the customer location (e.g., the number of circuits at DS1 level, the number of circuits at DS3 level, or the number of dark fibers.). (Columns M - O)	
Does your company have access to the entire customer location, including each individual unit within that location? [Section 51.319 (a)(5)(ii)(B)] (Column P)	For each answer for column P through U, provide your answer by each type of facility (I.e, a specific answer for dark fiber, DS-1, and/or DS-3)
Is the customer location served entirely by your company's facilities? (Column Q)	"
Is the customer location served by attaching your company's optronics to activate dark fiber transmission facilities provided by another carrier? (Column R)	"
Indicate if the customer location is served via an unaffiliated carrier to which your company has provided dark fiber. (Column S)	"
Is this high-capacity loop facility used to provide service to your company's retail customers? (Column T)	"
Is this high-capacity loop facility used by another carrier to provide service to its retail customers? (Column U)	"

Fill in the electronic spreadsheet **"loop_questions.xls"** with the following information for each Michigan customer location for which your company has deployed high-capacity loop facilities. These facilities might be used either by your own retail customers, or by an unaffiliated carrier's customer. Include facilities for both those customers served entirely by your own facilities and those for customers served by attaching your own optronics to activate dark fiber transmission facilities provided by another carrier.										
This matrix need not be completed by companies who do not <u>own</u> high-capacity loop facilities that are deployed in Michigan. For the purpose of this matrix, high capacity loop facilities you may rent or lease from SBC Michigan do not apply. If you do not <u>own</u> high-capacity loop facilities in Michigan, then so indicate, and you do not have to fill out the matrix."										
Company Name Goes Here					*Enter "X" if applicable*	*Enter "X" if applicable*	*Enter "X" if applicable*		
Street address of customer served by high-capacity loop (Note: loop facility must be owned by Company identified in cell A3).	**City of customer served by high-capacity loop**	**State of customer served by high-capacity loop**	**Five-digit zip code address of customer served by high-capacity loop**	**Customer Location V Coordinate (if readily available)**	**Customer Location H Coordinate (if readily available)**	**High-capacity loop type (dark fiber).**	**High-capacity loop type (DS1).**	**High-capacity loop type (DS3).**	**Customer serving wire center eight-digit CLLI code**	**Serving wire center V Coordinate**
A	**B**	**C**	**D**	**E**	**F**	**G**	**H**	**I**	**J**	**K**
note: delete this row and example rows below before adding your own company information						note: delete this row and example rows below before adding your own company information				
10 South Canal	Chicago	IL	60606	4700	1640	X		X	CHCGILWJDS	46329

				For each answer in Columns P through U, provide a answer for each specific loop type. For example, provide an answer for dark fiber facilities, DS-1 loops and DS-3 loops.					
Serving wire center H Coordinate	The number of dark fibers serving the customer location	The number of DS1 circuits serving the customer location .	The number of DS3 circuits serving the customer location	Does your company have access to the entire customer location, including each individual unit (i.e., customer premises) within that location?	Is the customer location served entirely by your company's facilities?	Is the customer location served by attaching your company's optronics to activate dark fiber transmission facilities provided by another carrier?	Indicate if the customer location is served via an unaffiliated carrier to which your company has provided dark fiber.	Is this high-capacity loop facility used to provide service to your company's retail customers?	Is this high-capacity loop facility used by another carrier to provide service to its retail customers?
L	**M**	**N**	**O**	**P**	**Q**	**R**	**S**	**T**	**U**
	note: delete this row and example rows below before adding your own company information							note: delete this row and example rows below before	
1629	8		2	Y (DS-3)				Y(DS-3)	
				N (DS-1)				N(DS-1)	

State of Michigan
Before the Michigan Public Service Commission
Case No. U-13796

VERIFICATION

State of ....)

)   ss.:

County of ....)

....verifies and

states: I am the .... of ....
              (Here insert the official title of the deponent)   (Here insert exact name of the reporting company)

....……...….…

I am familiar with the preparation of the foregoing information and know generally the contents thereof.
Said information

consists of ....………………………...
                    (Here insert exact identification of the information)

 ....

is true and correct to the best of my knowledge and belief.   As to matters not actually stated upon my knowledge,

the sources of my information and the grounds for my belief are as follows: ....

 ....

 ....

 ....

....……………….............................
                                 Signature

INSTRUCTIONS for "transport_questions.xls"	
Michigan Staff Transport Questions (for both ILECs and CLECs)	
FCC Rules, Sections 51.319 (e) (1) and (2)	
All licensed telecommunication carriers operating in SBC territory should	
answer these questions within 14 days of service.	
General Instructions	
The trigger information requested is to be provided on an electronic	
spreadsheet: "transport_questions.xls"	
This spreadsheet includes a few rows of	
example entries. Respondents should remove the example information before	
entering their own information. The number of spreadsheet rows which each	
ILEC and CLEC will be required to provide data on depends upon the number	
of transport routes for which each company	
has provisioned facilities. Detailed instructions are attached to the	
spreadsheet.	
The company's response may be marked "Confidential" or "Highly Sensitive	
Confidential Information" pursuant to the Protective Order entered in Case No. U-13796.	
Responses should be served upon the Michigan Public Service Commission Staff	
and upon all parties in Case No. U-13796.	
The electronic spreadsheets are	
set up in a manner that will allow the responses to be compiled, and	
queried in an efficient manner. These responses should be provided in	
light of SBC's filings regarding geographic areas and	
services to which they plan to challenge the FCC's impairment finding.	
After completing the spreadsheets, please save them electronically with	
your company name replacing the word "question" in the title of the	
spreadsheet. For example, "transport_",	
should precede your company name (e.g.,	
transport_COMPANY NAME.xls"). Send on 3.5 diskettes or compact	
disk (CD) within 14 days of service.	
All submissions should be marked with "**Case No. U-13796".**	
All submissions should be served upon parties in Case No. U-13796 and may, in	
accordance with the terms of the Protective Order, be served electronically (I.e.,	
via email or CD-Rom).	
Verification	
Upon completion of the spreadsheet, a representative of the Company should	
execute the verification page and include it with the response	
Instructions for completing the spreadsheet	
FCC Rules, Sections 51.319 (e) (1) and (2)	
This matrix need not be completed by companies who do not <u>own or lease</u>	
<u>from entity other than SBC Michigan</u> DS-1 or DS-3, or dark fiber	
transport facilities that are deployed in Michigan. For the purpose of this	
matrix, DS-1 or DS-3, or dark fiber transport facilities you may rent or lease	
from SBC Michigan do not apply. If you do not <u>own or lease from entity</u>	
<u>other than SBC Michigan</u> DS-1 or DS-3, or dark fiber transport facilities	
facilities in Michigan, then so indicate, and you do not have to fill out the	
matrix.	
Fill in the electronic spreadsheet "transport_questions.xls"	
with the following information for each Michigan CLLI to	
CLLI (ILEC central office to ILEC central office) transport route	
for which your company has self-provisioned transport facilities.	
These facilities might be used to provide service to your company's	
own customers or by another carrier to provide service to its customers.	
For purposes of this question, "transport facilities" (a) does not	
include unbundled facilities obtained from ILECs, and (b) does include	
dark fiber. A transport route between two points may pass through	
two or more intermediate wire centers or switches, including CLEC locations. The	
physical facilities used to serve a route need not follow the same physical path as	
the ILEC facilities.	

Complete each spread sheet completely (i.e., the first is for ILEC provided collocation only and the second include alternatively obtained collocation (i.e., collocation hotels). Note: complete spreadsheet rows once for transport route pair (e.g., for a transport route between Detroint and Birnmingham, complete spreadsheet rows for either DTRTMIBH to BRHMMIMN or for BRHMMIMN to DTRTMIBH, but not for both).	
Collocation arrangement CLLI code (e.g., CLLIXXXXXX). (Column A)	
In the first row of queries (row 4), "collocation arrangements" means ILEC-provided, including shared collocation space, only and does not include non-ILEC locations (e.g., "collocation hotels") in which your company is collocated with other carriers. In the second row of queries (row 17), "collocation arrangements" includes ILEC-provided, including shared collocation space, and also includes non-ILEC locations (e.g., "collocation hotels") in which your companyh is collocated with other carriers.	
Collocation arrangement street address (e.g., 10 South Canal) (Column B)	
Collocation arrangement city (e.g., Chicago). (Column C)	
Collocation arrangement state (i.e., IL). (Column D)	
Collocation arrangement five digit zip code (e.g., 60602). (Column E)	
Collocation arrangement vertical coordinate (e.g., 4620). This is a four- or five-digit number related to the geographic location of a switching entity found in table 7 of the Local Exchange Routing Guider (LERG7). This should not be confused with the Rate Center found in Table 8 of the LERG (LERG8). (Column F)	
Collocation arrangement horizontal coordinate (e.g.,1632). See note above. (Column G)	
Type of collocation arrangement (caged, cageless, or virtual). (Columns H –J)	
The number of transport circuits connecting the collocation facilities at each end of the route. (Column K)	
For each transport route to a connected Collocation Arrangement (i.e., for each CLLI to CLLI pair) (e.g., CLLIXXXXXX to CLLIXXXXZZ).	
Dedicated transport type (dark fiber, DS1, DS3). (Columns L – N)	
The number of dark fibers, the number of DS1 level transport circuits, and/or the number of DS3 level transport circuits. (Columns O – Q)	
Connected collocation CLLI code (e.g., CLLIXXXXZZ). (Column R)	
Connected collocation arrangement street address (e.g., 602 N. York Ave.). (Column S)	
Connected collocation arrangement city (e.g., Bensenville). (Column T)	
Connected collocation arrangement state (i.e., IL). (Column U)	
Connected collocation arrangement five digit zip code. (e.g., 60106). (Column V)	
Connected collocation arrangement V coordinate (e.g., 4600). (Column W)	
Connected collocation arrangement H coordinate (e.g.,1600). (Column X)	
	If the answer to the questions in column Y and/or Z are "Yes", please specify each type of facility used (I.e., dark fiber, DS-1, DS-3)
Is this transport facility used to provide service to your own retail customers? (Column Y)	
Is this transport facility used by another carrier to provide service to its customers? (Column Z)	"

| | | | | | | | Enter "X" if applicable | Enter "X" if applicable | Enter "X" if applicable | |

Fill in the electronic spreadsheet "transport_questions.xls" with the following information for each Michigan CLLI to CLLI (ILEC central office to ILEC central office) transport route for which your company has self-provisioned transport facilities. These facilities might be used to provide service to your company's own customers or by another carrier to provide service to its customers. For purposes of this question, "transport facilities" (a) does not include unbundled facilities obtained from ILECs, and (b) does include dark fiber. A transport route between two points may pass through two or more intermediate wire centers or switches, including CLEC locations. The physical facilities used to serve a route need not follow the same physical path as the ILEC facilities. Complete each spread sheet completely (i.e., the first is for ILEC provided collocation only and the second include alternatively obtained collocation (i.e., collocation hotels). Note: complete spreadsheet rows once for transport route pair (e.g., for a transport route between Detroint and Birmingham, complete spreadsheet rows for either DTRTMIBH to BRHMMIMN or for BRHM

This matrix need not be completed by companies who do not own or lease from entity other than SBC Michigan DS-1 or DS-3, or dark fiber transport facilities that are deployed in Michigan. For the purpose of this matrix, DS-1 or DS-3, or dark fiber transport facilities you may rent or lease from SBC Michigan do not apply. If you do not own or lease from entity other than SBC Michigan DS-1 or DS-3, or dark fiber transport facilities facilities in Michigan, then so indicate, and you do not have to fill out the matrix.

Company Name Goes Here							Enter "X" if applicable	Enter "X" if applicable	Enter "X" if applicable	
Collocation arrangement central office CLLI code. For the purpose of this question and the remaining columns, "collocation arrangment" includes only ILEC provided, including shared collocation space, and does not include non-ILEC provided locations (e.g., "collocation hotels") in which your company is collocated with other carriers.	Collocation arrangement street address	Collocation arrangement city	Collocation arrangement state	Collocation arrangement five digit zip code	Collocation arrangement vertical coordinate	Collocation arrangement horizontal coordinate	Type of collocation arrangement (caged)	Type of collocation arrangement (cageless)	Type of collocation arrangement (virtual)	The number of transport circuits connecting the collocation facilities at each end of the route.
A	B	C	D	E	F	G	H	I	J	K
note: delete this row and example rows below before adding your own company information						note: delete this row and example rows below before adding your own company information				
				12223	4620	1632	X			3
				12223	4620	1632	X			3
DTRTMIBH				12223	4620	1632	X			3
				12180	4600	1600		X		2
				12180	4600	1600		X		2
Collocation arrangement central office CLLI code. For the purpose of this question and the remaining columns, "collocation arrangment" includes ILEC provided, including shared collocation space, and also includes non-ILEC provided locations (e.g., "collocation hotels") in which your company is collocated with other carriers. Do not repeat information provide above.	Collocation arrangement street address	Collocation arrangement city	Collocation arrangement state	Collocation arrangement five digit zip code	Collocation arrangement vertical coordinate	Collocation arrangement horizontal coordinate	Type of collocation arrangement (caged)	Type of collocation arrangement (cageless)	Type of collocation arrangement (virtual)	The number of transport circuits connecting the collocation facilities at each end of the route.

For each transport route to a connected Collocation Arrangement (i.e., for each CLLI to CLLI pair) (e.g., CLLIXXXX to CLLIXXZZ). ====================>

Enter "X" if applicable	Enter "X" if applicable	Enter "X" if applicable											Enter "Y" if yes, blank if no	Enter "Y" if yes, blank if no
Dedicated transport type (dark fiber)	Dedicated transport type (DS1)	Dedicated transport type (DS3)	The number of dark fibers	The number of DS1 level transport circuits.	The number of DS3 level transport circuits.	Connected collocation CLLI code	Connected collocation arrangement street address	Connected collocation arrangement city	Connected collocation arrangement state	Connected collocation arrangement five digit zip code	Connected collocation arrangement vertical coordinate	Connected collocation arrangement horizontal coordinate	Is this transport facility used to provide service to your own retail customers?	Is this transport facility used by another carrier to provide service to its customers?
L	**M**	**N**	**O**	**P**	**Q**	**R**	**S**	**T**	**U**	**V**	**W**	**X**	**Y**	**Z**
						note: delete this row and example rows below before adding your own company information			note: delete this row and example rows below before adding your own company information					
	X		8	4	1								Y (DS-1)	Y (DS-3)
X	X		8	3	2								Y (DS-3)	
		X	8	2	1	BRHMMIMN								Y (DS-3)
X	X		8	3	2								Y (DS-1)	
	X		8	1	1								Y (dark fiber)	

Dedicated transport type (dark fiber)	Dedicated transport type (DS1)	Dedicated transport type (DS3)	The number of dark fibers	The number of DS1 level transport circuits.	The number of DS3 level transport circuits.	Connected collocation CLLI code	Connected collocation arrangement street address	Connected collocation arrangement city	Connected collocation arrangement state	Connected collocation arrangement five digit zip code	Connected collocation arrangement vertical coordinate	Connected collocation arrangement horizontal coordinate	Is this transport facility used to provide service to your own retail customers?	Is this transport facility used by another carrier to provide service to its customers?

State of Michigan
Before the Michigan Public Service Commission
Case No. U-13796

VERIFICATION

State of ....)

)   ss.:

County of ....)

....verifies and

states: I am the .... of ....

        (Here insert the official title of the deponent)   (Here insert exact name of the reporting company)

....……...…..…

I am familiar with the preparation of the foregoing information and know generally the contents thereof.
Said information

consists of ....……………………………..

                     (Here insert exact identification of the information)

....

is true and correct to the best of my knowledge and belief.   As to matters not actually stated upon my knowledge,

the sources of my information and the grounds for my belief are as follows: ....

....

....

....

..............................…………………............................

                                Signature

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**

Steven D. Hughey (P32203)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Suite 15
Lansing, MI 48911
Telephone: (517) 241-6680

DATED: October 31, 2003

In the matter, on the Commission's own motion,) to facilitate the implementation of the Federal) Communication Commission's Triennial Review) determination in Michigan.) _____)) In the matter, on the Commission's) own motion, to investigate and to) implement, if necessary,) a batch cut migration process.)	Case No. U-13796 Case No. U-13891

PROTECTIVE ORDER

It is hereby ORDERED that:

This Order is a mandatory protective order entered pursuant to § 210 of the Michigan Telecommunications Act, MCL 4210. Its terms shall apply in both of the captioned proceedings (hereinafter "proceeding" or "proceedings") listed above.

1.   Confidential Information

(a)   For purposes of this Order only, "Confidential Information" consists of all documents, data, information, studies, cost study information, models, diagrams, flowcharts, and other materials, and includes but is not limited to oral or other tangible or intangible form such as ideas, concepts, and know-how, designated as confidential (using one or more of the methods of identification described below) by a producing party and furnished pursuant to requests for information or admissions, depositions, or otherwise during this proceeding.   For purposes of this Order, "Confidential Information" also consists of underlying work papers, cost data supporting the studies, as well as customer usage data, marketing studies and contracts between

providers and other trade secrets and proprietary, commercial or financial information as those

terms are used in Section 210 of the MTA, MCL 484.2210(3). "Confidential Information" shall

not include information contained in the public files of any federal or state agency that is subject

to disclosure under relevant law, nor shall it include information that, at the time it is provided

through discovery or otherwise during these proceedings or prior thereto, is or was public or that

becomes public other than through disclosure in violation of this Order. "Confidential

Information" shall not include information found by the Administrative Law Judge, the

Commission or a court of competent jurisdiction not to merit the protection afforded

Confidential Information under the terms of this Order.

(b)   This Order shall be construed in accordance with the "Critical

Infrastructure Information Act of 2002," Pub. L. 107-296, codified at 6 U.S.C.A § 101 et seq.

2.   Use of Confidential Information

(a)   Except as limited in this paragraph (2), and subject to paragraphs (3) and

(4) of this Order, Confidential Information made available pursuant to this Order shall be used

only by the following persons:

(1)   receiving party's counsel of record and any attorneys and legal
assistants employed by or associated with counsel of record and
acting at the direction of counsel of record;

(2)   regulatory personnel employed by the receiving party who are
acting at the direction of counsel;

(3)   outside consultants retained by the receiving party and who are
under the direction of either counsel or regulatory personnel as set
forth in paragraph 2 (a)(2);

(4)   persons requested by counsel of record to prepare testimony,
affidavits, exhibits or other materials for submission to the
Commission on behalf of the receiving party.

(b)   Confidential Information made available pursuant to this Order shall be used only by the persons listed in paragraph (2)(a), and as described herein, provided that such regulatory personnel, witness(es), employees and independent consultants granted access to confidential information as provided herein may not be engaged in strategic or competitive decision-making for planning, marketing, or selling telephone services or other offerings, strategic or business planning; competitive assessment; and/or network planning or procurement on behalf of the receiving party, unless the producing party gives prior written authorization for specific individuals in the prohibited categories above to review the Confidential Information, which shall not be unreasonably withheld, delayed or denied. If the producing party refuses to respond in a timely manner to a request for such authorization, the receiving party may, for good cause shown, request a ruling or an order from the Administrative Law Judge allowing an individual involved in the prohibited categories above to have access to the Confidential Information received by a party. The producing party shall be given the opportunity to respond (either in writing or orally in a hearing before the Administrative Law Judge, at the administrative Law Judge's discretion) to the request for access before any ruling or order granting such access is issued by the Administrative Law Judge.

(c)   In the event that a party has fewer than four employees with relevant expertise other than counsel who are entitled to receive any particular Confidential Information, such party may designate three employees who shall be entitled to receive such Confidential Information solely for purposes of such party's participation in this proceeding. The receiving party shall inform the producing party of the names, job titles and job descriptions of the three designated employees. A producing party who objects to any of the party's three designated

employees receiving any particular Confidential Information shall expeditiously bring an appropriate motion before the Administrative Law Judge for resolution of the matter.

(d)   Confidential Information should be requested, reviewed, used or disclosed only by or to the persons authorized under this Order and only in accordance with the terms specified herein. The use, review or disclosure of Confidential Information is limited to the following purposes:

(1)   for use in connection with this proceeding or any administrative or judicial appeals thereof;

(2)   for use in other proceedings to be conducted by this Commission in connection with or arising from these proceedings, and

(3)   for use in proceedings similar to this proceeding conducted by other state public utility commissions or the Federal Communications Commission regarding matters subsequent to the Federal Communications Commission *Triennial Review Order—In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers* CC Docket No. 01-338, *Report and Order on Remand (rel. August 21, 2003)*, provided that prior to use or disclosure of the Confidential Information in such similar proceedings, such other state public utility commission(s) or the Federal Communications Commission has in effect a protective order, or has approved a nondisclosure agreement, that provides substantially similar protections for the Confidential Information.

(e)   Notwithstanding the above, handling of the Confidential Information by clerical personnel for clerical purposes at the direction of persons specified in Section 2(a) shall not be deemed a violation of this Order.

(f)   Prior to the release of the Confidential Information to any party in these proceedings, counsel for the requesting party shall provide counsel for the producing party signed acknowledgments (attached as EXHIBIT A to this Protective Order) from each individual

or entity described in paragraph (2) who will receive confidential information that each individual or entity will abide by the terms of this Order.

     3.   <u>Highly Sensitive Confidential Information.</u>

     (a)   Certain highly sensitive Confidential Information may, in good faith, be designated as "HIGHLY SENSITIVE CONFIDENTIAL INFORMATION." Such HIGHLY SENSITIVE CONFIDENTIAL INFORMATION shall be made available only to the receiving party's counsel, as well as to the receiving party's witnesses, personnel assisting those witness with preparing their testimony (not to exceed a reasonable number of necessary support persons for any one witness) who are not in the aforementioned prohibited categories, employees in the regulatory organization (not to exceed eight such (non-counsel) employees, except that a receiving party may request in writing permission to make available HIGHLY SENSITIVE CONFIDENTIAL INFORMATION to one or more additional employees (beyond the eight already designated) in the regulatory organization, and the producing party may give prior written authorization for the specific additional individuals, which shall not be unreasonably withheld, delayed or denied, to review such HIGHLY SENSITIVE CONFIDENTIAL INFORMATION) who are not in the aforementioned prohibited categories, and independent consultants in this proceedings who have a need to know and who are not engaged in strategic or competitive decision-making for developing, planning, marketing, or selling telephone services or other offerings, strategic or business planning; competitive assessment; and/or network planning or procurement on behalf of the receiving party.

     (b)   Access by such counsel, the receiving party's witnesses and independent consultants whom are not part of the aforementioned prohibited categories to HIGHLY SENSITIVE CONFIDENTIAL INFORMATION shall be given only after each such counsel, witness or independent consultant has signed Exhibits A and B, attached hereto. A receiving party must deliver copies of Exhibits A and B (via email and/or confirmed facsimile transmission) to counsel for a producing party before that receiving party can receive and review HIGHLY SENSITIVE CONFIDENTIAL INFORMATION. Access by the receiving party's witnesses and independent consultants whom are a part of the aforementioned prohibited categories to HIGHLY SENSITIVE CONFIDENTIAL INFORMATION shall be given only after written consent of the Producing Party and only after each witness or independent

consultant has signed Exhibits A and B, attached hereto. If the parties cannot agree on such access within a reasonable time, the parties may seek rapid resolution from the Administrative Law Judge or the Commission. The producing party shall be given the opportunity to respond to the request for access before any order granting such access is issued by the ALJ or the Commission.

(c)   In the event that a party has fewer than four employees with relevant expertise other than counsel who are entitled to receive any particular HIGHLY SENSITIVE CONFIDENTIAL INFORMATION, such party may designate three employees who shall be entitled to receive such HIGHLY SENSITIVE CONFIDENTIAL INFORMATION solely for purposes of such party's participation in the Proceeding. The receiving party shall inform the producing party of the names, job titles and job descriptions of the three designated employees. A producing party who objects to any of the party's three designated employees receiving any particular HIGHLY SENSITIVE CONFIDENTIAL INFORMATION shall expeditiously bring an appropriate motion before the Administrative Law Judge for resolution of the matter.

4.   Third Party Confidential Information

(a)   During the course of these proceedings non-parties may be required to submit Confidential Information to parties or to the Commission pursuant to subpoena or otherwise. Such third party information that is properly labeled HIGHLY SENSITIVE CONFIDENTIAL INFORMATION and/or Confidential Information shall be subject to the procedures and protections provided under this Protective Order.

5.   Delivery of Documentation

The Confidential Information submitted pursuant to this Order should be provided as follows:

(a)   Confidential Information filed with the Commission shall be provided to requesting parties within 24 hours of the party's respective request, or as soon thereafter as reasonably possible;

(b)   Any underlying work papers and data subsequently requested by a party shall be submitted to that party within three days of receipt by the producing party of the request, or as soon thereafter as reasonably possible, to the extent to which discovery is allowed or conducted in this proceeding regarding such work papers and data.

(c)   Delivery of the Confidential Information to counsel will constitute delivery to a party. The producing party should clearly denote on each and every document submitted that information which it deems confidential pursuant to this Order. If documents which are served are available in electronic format, they also shall be served electronically to the parties.

6.   Procedures

(a)   Testimony/Affidavits. If the requesting party refers to Confidential Information in testimony or affidavits, such reference(s) shall be placed in a sealed record as (an) exhibit(s) to such testimony or affidavits.

(b)   Seal. While in the custody of the Commission, the materials containing Confidential Information shall be marked, "[Insert Producing Party Name, *i.e.,* SBC] CONFIDENTIAL INFORMATION" (or, where applicable, "[Insert Producing Party Name, *i.e.,* SBC] HIGHLY SENSITIVE CONFIDENTIAL INFORMATION") and shall be placed in a separate portion of the record under seal, and the parties request that the Commission shall take reasonable steps to protect such material from disclosure to persons not subject to the Order.

(c)   Discovery. The procedures specified in this Order shall apply to all Confidential Information provided to any party or parties pursuant to discovery requests made prior to, during, or after hearings in cases to which the Order pertains.

(d)   Transcripts, Pleadings and Briefs.   Any references to Confidential Information in the transcripts, exhibits, briefs, pleadings and comments in this proceeding shall be placed under seal and shall be placed in a separate section of such documents and submitted to the Commission under seal.

(e)   Hearing Room Procedure. If Confidential Information is to be used in oral testimony, cross-examination or argument, it shall be on sufficient notice to allow the presiding officer an opportunity to take measures within his or her control to protect the confidentiality of the information.

(f)   Segregation of Files. Parts of any writing, depositions reduced to writing, written examinations, interrogatories and answers thereto, or other written references or notes to Confidential Information, if filed with the Commission, shall be sealed, segregated in the files of the Commission, and withheld from inspection by any party not bound by the terms of this Order, unless such Confidential Information is released from the restrictions of this Order, either through agreement of the parties or, after notice to the parties and hearing, pursuant to an order of the Commission and/or final order of a court of competent jurisdiction.

(g)   Use of Sealed Information. No information under seal pursuant to this Order shall be used in any manner except pursuant to Commission order, or final order of a court of competent jurisdiction after notice to the producing party and hearing, either unsealing such information or providing for the use of such information.

7.   <u>Preservation of Confidentiality</u>

No person who is afforded access to any Confidential Information by reason of this Order shall disclose the Confidential Information to anyone not specifically authorized to receive such information pursuant to the terms of this Order. Nor shall such persons use the

Confidential Information in any manner inconsistent with this Order. All persons afforded access to Confidential Information pursuant to this Order shall keep the Confidential Information secure in accordance with the purposes and intent of this Order and shall adopt all reasonable precautions to assure continued confidentiality, including precautions against unauthorized copying, use or disclosure thereof.

8. Rights Under the Order

The parties retain the right to challenge whether a document or information is in fact Confidential Information, including whether information is, in fact, proprietary information and whether such information can be withheld under paragraph (1) of this Order. The treatment of Confidential Information under this Order is not of precedential effect for other proceedings, except as indicated in this Order, and the Parties retain their rights to dispute such treatment in this or any other proceeding.

A party that seeks or intends to disclose, on the public record, information taken directly from materials produced by another party, and that has been identified as Confidential Information by the producing party, must, before actually disclosing the information on the public record, first do one of the following: (a) contact counsel for the producing party and seek permission to place the information on the public record; (b) take affirmative steps to confirm that the information is otherwise public information and falls within the exclusions contained in Paragraph 10 herein; or (c) challenge the confidential nature of the Confidential Information and obtain a ruling that said information is not confidential or may be disclosed.

9. Retention of Documents

Within sixty (60) days of completion of these proceedings, including any administrative or judicial review, all documents containing Confidential Information provided under the terms of this Order shall be returned to the producing party, except that any notes or comments or materials prepared by counsel for the requesting parties need not be returned. The obligation to return Confidential Information shall be satisfied by return of all the Confidential Information or submission of an affidavit that the Confidential Information has been destroyed, returned, or, following reasonable search, is lost and cannot be located. Counsel for the

requesting party or parties shall have the right to retain copies of the pleadings, orders, transcripts, briefs, comments and exhibits in these proceedings.

10.   Inapplicability

The obligations of this Order shall not apply to any Confidential Information if a Party can demonstrate that it:

(a)   is or becomes available to the public through no breach of this Order;

(b)   was previously known by the party without any obligation to hold it in confidence;

(c)   is received from a third party free to disclose such information without restriction;

(d)   is independently developed by the party without the use of Confidential Information furnished to the party;

(e)   is approved for release by written authorization of the provider of the Confidential Information, but only to the extent of such authorization;

(f)   is required by law or regulation to be disclosed, but only to the extent and for the purposes of such required disclosure, or is submitted to a regulatory commission, agency or court of competent jurisdiction under a protective agreement or order;

(g)   is disclosed in response to a valid order of a court of competent jurisdiction or governmental body, but only to the extent and for the purposes of such order, and only if the recipient first notifies the producer of the Confidential Information to seek an appropriate protective order.

11.   Violation of Order

In the event any party, person or entity subject to the terms of this Order fails to maintain the confidentiality of Confidential Information or otherwise violates the terms hereof, the presiding Officer or Commission may impose such sanctions upon the offending party, person or entity as the presiding officer or Commission deem appropriate under the circumstances, which may include, but are not limited to, any sanctions provided for under the Michigan Rules of Court.

Should a party, a party's representative, or any other person or entity that has properly obtained access to Confidential Information under this Order violate any of its terms, it shall immediately convey that fact to the Commission and to the producing party. Further, should such violation consist of improper disclosure or use of Confidential Information, the violating party shall take all necessary steps to remedy the improper disclosure or use. The violating party also shall immediately notify the Commission, the presiding officer, and the producing party, in writing, of the identity of each person known or reasonably suspected to have obtained the Confidential Information through any disclosure.

Any disclosure deemed to cause irreparable harm not capable of quantifying loss may entitle the producing party to injunctive relief.

A party, a party representative or other person or entity that breaches this Protective Order remains subject to sanctions regardless of whether or not the producing party could have discovered the violation earlier than when it actually was discovered. In addition, the sanctions for any violation of this Protective Order apply to inadvertent accidental violations, as well as intentional disclosures. Nothing in this Protective Order shall limit any other rights and

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remedies available to the producing party at law or equity against any party using Confidential

Information in a manner not authorized by this Protective Order.

IT IS SO ORDERED:

_____
Administrative Law Judge

Date:

EXHIBIT A
TO
PROTECTIVE ORDER

Michigan Public Service Commission Docket No. U-13796 & U-13891

I have received and read and agree to comply with and be bound by the terms and conditions of this Protective Order.

SIGNATURE: _____

NAME PRINTED: _____

TITLE: _____

ADDRESS: _____

_____

REPRESENTING: _____

EMPLOYER: _____

DATE: _____

Michigan Public Service Commission Docket No. U-13796 & U-13891

STATEMENT OF RECEIPT OF HIGHLY SENSITIVE CONFIDENTIAL INFORMATION

I, _____, acknowledge receipt of the Highly Sensitive Confidential Information described below and agree to maintain in accordance with the terms of this Protective Order. These copies are to remain in the possession of:

Name: _____

Title: _____

Address: _____

_____

Job
Description: _____

_____

_____

_____

Signed on this _____ day of _____ 2003.

_____
Signature

_____
Name (Printed)

Description of Highly Sensitive Confidential Information:

Data Request Number:

Party who originally

propounded data request: